

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NUMBER: 2:25-cr-00362
)	
-versus-)	
)	
JEROME SYDNEY HEYWARD,)	MOTION FOR EXTENSION OF TIME
)	TO RESPOND TO PRE-SENTENCE
Defendant.)	INVESTIGATION REPORT
)	

The Defendant, Jerome Heyward, by and through his attorney Andrew J. Savage, III, hereby moves for an extension of time to respond to the Pre-Sentence Investigation Report prepared by United States Probation Officer Kelli Frye and submitted to the Court on June 16, 2025. The Defendant's response is currently due by June 30, 2025, and he hereby requests a thirty (30) day extension, as Mr. Savage is currently in trial for *The State of South Carolina v. Michael Colucci* in Berkeley County General Sessions Court for a two-week Term of Court. (See Attachment - Notice of Trial)

Respectfully submitted,

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Charleston, South Carolina

June 17, 2025